

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

KRISHNA PRASAD ADHIKARI, *et al.*,)
)
Plaintiffs,)
)
vs.)
)
KBR, INC., *et al.*,)
)
Defendants.)
)
_____)

Civil Action No.: 4:16-CV-2478

Judge KEITH P. ELLISON

NOTICE OF RELATED LITIGATION

Pursuant to Local Rule 5.2, Plaintiffs hereby advise the Court that they have initiated litigation related to the above-captioned action. Specifically, this action is related to *Adhikari v. Halliburton Co.*, 1:20-mc-00029, filed May 6, 2020, and docketed May 13, 2020, in the United States District Court for the District of Columbia, and assigned to Judge Colleen Kollar-Kotelly.

The District of Columbia action is a motion to enforce subpoenas duces tecum issued out of this Court for production of documents relevant to Plaintiffs' claims in the above-captioned matter. Plaintiffs-Movants Krishna Prasad Adhikari, Biplav Bhatta, Lukendra Gurung, Sanjiv Gurung, and Suraj Lamichhane served Halliburton Company and Halliburton Energy Services, Inc. (collectively, "Halliburton") with subpoenas duces tecum pursuant to Federal Rule of Civil Procedure 45 on April 1, 2020. Halliburton was the corporate parent of the KBR Defendants in the above-captioned matter during the events that gave rise to Plaintiffs' allegations, and Plaintiffs recently learned it retained certain documents relevant to Plaintiffs' claims after the 2007 corporate split between Halliburton and the KBR Defendants. Defendants in the above-captioned matter were served with copies of the subpoenas and did not object, advising that Halliburton would not produce documents voluntarily.

For these reasons, Plaintiffs provide notice that the two actions are related.

May 13, 2020

Respectfully submitted,

/s/ Agnieszka M. Fryszman

Agnieszka M. Fryszman

Attorney in charge, *pro hac vice*

Nicholas Jacques,* *pro hac vice*

**COHEN MILSTEIN SELLERS & TOLL
PLLC**

1100 New York Ave. NW, Fifth Floor

Washington, DC 20005

Telephone: (202) 408-4600

Facsimile: (202) 408-4699

afryszman@cohenmilstein.com

njacques@cohenmilstein.com

Paul L. Hoffman, *pro hac vice*

John Washington, *pro hac vice*

**SCHONBRUN SEPLOW HARRIS &
HOFFMAN L.L.P.**

1543 W. Olympic Blvd.

Los Angeles, CA 90064

Tel: (310) 396-0731

Fax: (310) 396-7040

hoffpaul@aol.com

jwashington@sshhlaw.com

Counsel for Plaintiffs

**Admitted to practice law in Kansas; all legal work performed under supervision of an attorney barred in the District of Columbia while application to the District of Columbia Bar is pending*

CERTIFICATE OF SERVICE

I hereby certify that on May 13, 2020, I electronically filed *Notice of Related Litigation* with the Clerk of the Court using the ECF, who in turn sent notice to all counsel of record.

Dated: May 13, 2020

/s/ Agnieszka M. Fryszman

Agnieszka M. Fryszman